



DEMETER ASSOCIATION, INC.

For Certification of BIODYNAMIC AGRICULTURE

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May 14, 1999

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Rm 1061
Rockville, MD 20852

Ref: Docket #98N-1038

"Irradiation in the production, processing and handling of food"

WHO WE ARE

Demeter Association is a certification agency for Biodynamic/organic agriculture. The products we certify include vegetables, meat, milk, eggs, herbs, grains, coffee, tea, and various other foods. Demeter has existed as an ecological trademark for certification since the early part of this century. It is known worldwide, though not so much in the U.S.

OUR POSITION

We take a strong position that all irradiated food must be labeled, and we affirm that our members and friends are greatly concerned that their ability to make an informed choice be maintained and not be taken from them.

Irradiation is not acceptable in Biodynamic and Organic farming and handling. Consumers seek this type of food often for very personal reasons of health (allergies, chemical sensitivity, etc.) and also because they want to choose how their food is grown, handled, and delivered to them. If the food industry is allowed to deliver irradiated food to the public without labeling it as irradiated, the public is robbed of their right to know, and even of the possibility of knowing, how their food has been handled.

We have these specific concerns:

- Irradiated foods may lose vitamins. These losses will not be obvious or expected by the consumer of fresh fruits and vegetables.
- Irradiation creates new chemical compounds called radiolytic products. What happens to a population exposed to "used" radioactivity? The Gulf War Syndrome may offer one scenario.
- The ill, the chemically sensitive, and everyone who eats unlabeled irradiated foods will never know if this food is affecting their health.
- An increase in radiation facilities will also increase accidental radiation hazards, including worker exposure and further environmental contamination. We will all be affected in a myriad of ways.
- Irradiation will offer false security to those who do not understand that it is not totally effective.

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- Irradiation is unnecessary to insure a safe food supply. It is purely and simply an attempt by the nuclear industry to find a socially acceptable use for their hazardous waste. The nuclear industry is motivated by profit, not by concerns for the environment, for our health, or for what is morally right.

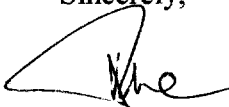
In a time when so many serious illnesses exist, such as cancer, Alzheimers, Parkinson's, lupus, AIDS, hepatitis, cystic fibrosis, Lou Gehrig's disease (ALS), etc., many people are finally becoming aware that the way we live affects our health through subtle connections we do not yet understand. Many are becoming more aware of the need to look closely at what we eat and drink in order to maximize our physical health and to minimize any potentially damaging practices which could influence the quality of our food.

The argument that irradiation labeling may have a negative effect on the sale of irradiated food is an obvious statement, and it clearly reflects how strongly people feel about this issue. If the nuclear industry wants to help people feel more comfortable with nuked food, the burden of persuasion is upon them – even as it is on the tobacco industry - which by the way is required to publish clear warnings on each cigarette package. Let's not go backwards in keeping consumers informed. Choice belongs to the people; influencing that choice belongs to the concerned stakeholders.

Non-labeling of irradiated foods violates our right to know what we consume. It violates the honesty and morality we seek to support.

We urge FDA to keep labeling irradiated foods. We urge you to include manufactured foods as well as whole foods in the labeling requirement. We in the Biodynamic and organic community want to know what we are consuming, because we value the health of our nation's people and our environment.

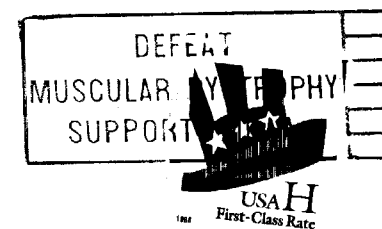
Sincerely,

A handwritten signature in black ink, appearing to read 'Anne', with a large, sweeping initial 'A'.

Anne Mendenhall
Director



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